

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**Re: D.I. 2196**

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS' SECOND MOTION  
FOR ENTRY OF AN ORDER EXTENDING THE DEBTORS' TIME TO FILE NOTICES  
OF REMOVAL OF CLAIMS AND CAUSES OF ACTION RELATED TO THE  
DEBTORS' CHAPTER 11 CASES**

The undersigned hereby certifies that, as of the date hereof, the above-captioned debtors and debtors in possession (the “**Debtors**”) have received no answer, objection or other responsive pleading to the *Debtors’ Second Motion of Debtors for Entry of an Order Extending the Debtors’ Time to File Notices of Removal of Claims and Causes of Action Related to the Debtors’ Chapter 11 Cases* (D.I. 2196) (the “**Motion**”), filed on March 10, 2025.

The undersigned counsel further certifies that no answer, objection or other responsive pleading to the Motion appears on the Court’s docket in these cases. Pursuant to the Motion, objections were to be filed and served no later than March 18, 2025, at 4:00 p.m. (ET).

WHEREFORE, the Debtors respectfully request that the Court enter the proposed order attached to the Motion at its earliest convenience.

---

<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Dated: March 20, 2025  
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Casey B. Sawyer

Robert J. Dehney, Sr. (No. 3578)  
Andrew R. Remming (No. 5120)  
Daniel B. Butz (No. 4227)  
Sophie Rogers Churchill (No. 6905)  
Casey B. Sawyer (No. 7260)  
1201 N. Market Street, 16<sup>th</sup> Floor  
Wilmington, DE 19801  
Tel: (302) 658-9200  
rdehney@morrisnichols.com  
aremming@morrisnichols.com  
dbutz@morrisnichols.com  
srchurchill@morrisnichols.com  
csawyer@morrisnichols.com

-and-

DAVIS POLK & WARDWELL LLP

Brian M. Resnick (admitted *pro hac vice*)  
Adam L. Shpeen (admitted *pro hac vice*)  
Stephen D. Piraino (admitted *pro hac vice*)  
Ethan Stern (admitted *pro hac vice*)  
450 Lexington Avenue  
New York, NY 10017  
Tel.: (212) 450-4000  
brian.resnick@davispolk.com  
adam.shpeen@davispolk.com  
stephen.piraino@davispolk.com  
ethan.stern@davispolk.com

*Counsel to the Debtors and Debtors in Possession*